

## **EXHIBIT H**

**In re: MOTORS LIQUIDATION COMPANY, et al.,**  
**f/k/a General Motors Corp., et al., No. 09-50026**

**Plaintiffs and Participating Unitholders' Affirmative Designations of the Deposition**  
**Testimony of Beth Andrews and the GUC Trust and New GM's Objections Thereto**

<b>Beth Andrews November 15, 2017</b>		
<b>Plaintiffs and Participating Unitholders' Affirmative Designations</b>		<b>GUC Trust and New GM Objections</b>
<b>Designation Begin</b>	<b>Designation End</b>	
11:14	11:25	
16:20	16:25	
17:14	18:1	
18:15	18:18	Vague and ambiguous; Compound (FRE 611(a)); Lack of foundation (FRE 602).
18:22	18:24	Vague and ambiguous; Compound (FRE 611(a)); Lack of foundation (FRE 602).
22:14	22:20	
22:24	22:25	
25:2	25:9	
26:1	26:2	
26:6	26:13	
27:9	27:10	
27:14	27:16	
30:22	31:16	
39:11	39:16	Relevance; Vague and ambiguous; Lack of foundation (FRE 602).
39:18	40:1	Relevance; Vague and ambiguous; Lack of foundation (FRE 602).
40:5	40:14	Relevance (40:5-14); Vague and ambiguous; Lack of foundation (FRE 602) (40:5).
42:19	42:20	Vague and ambiguous; Lack of foundation (FRE 602).
42:23	43:6	Vague and ambiguous; Lack of foundation (FRE 602) (49:23).
43:8	43:14	
46:8	47:9	
47:11	47:25	Vague and ambiguous; Lack of foundation (FRE 602); Cumulative (47:22).

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
48:5	49:10	Vague and ambiguous; Lack of foundation (FRE 602); Cumulative (48:5).
56:6	56:8	
56:12	56:15	
56:17	56:21	
59:3	59:16	Relevance.
59:23	60:9	Relevance.
60:11	60:15	Relevance.
60:20	61:10	Relevance.
61:18	64:1	Relevance.
64:5	64:15	Relevance
64:19	64:20	Relevance
70:21	71:6	Vague and ambiguous (71:3-6).
71:8	71:9	Vague and ambiguous.
71:16	71:21	Vague and ambiguous; question is incomplete as stated.
72:13	72:15	Asked & Answered (FRE 403)
72:20	72:20	
72:21	73:25	Vague and ambiguous; Mischaracterizes testimony (73:21–73:25).
74:3	74:20	Vague and ambiguous; Mischaracterizes testimony (74:3-4); Lack of foundation or personal knowledge (FRE 602); Calls for speculation (74:17-20).
74:25	75:8	Lack of foundation or personal knowledge (FRE 602); Calls for speculation.
75:13	75:22	Lack of foundation (FRE 602); Calls for speculation (75:13-15).
75:25	76:9	
78:16	80:1	
80:15	81:6	
82:21	84:6	
89:24	90:3	Lack of Foundation (FRE 602)
90:9	90:18	Lack of Foundation (FRE 602)
90:21	90:22	
98:24	99:2	

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
99:7	99:21	
100:3	100:6	
100:17	100:19	
100:23	101:4	Vague and ambiguous.
101:7	101:8	Vague and ambiguous.
101:11	101:23	Vague and ambiguous; Lack of foundation (FRE 602 (101:13-23)
102:2	102:9	Vague and ambiguous; Lack of foundation (FRE 602) 102:2-3).
103:6	104:11	Vague and ambiguous; Lack of foundation (FRE 602) (104:5-11).
104:14	104:22	Vague and ambiguous; Lack of foundation (FRE 602) (104:16-22).
104:25	106:14	Vague and ambiguous; Lack of foundation (FRE 602) (104:25).
107:2	109:2	
109:10	110:22	Vague and ambiguous; Lack of foundation (FRE 602) (110:20-110:22).
110:25	111:21	Vague and ambiguous; Lack of foundation (FRE 602) (110:25-111:2); Mischaracterizes testimony (111:13-21).
111:24	111:25	Mischaracterizes testimony.
115:4	115:7	
118:6	120:16	Calls for speculation; Lack of foundation (FRE 602) (120:12-21).
120:20	121:1	Mischaracterizes testimony; Calls for speculation; Lack of foundation (FRE 602) (120:23-121:1).
121:8	121:15	Mischaracterizes testimony; Calls for speculation; Lack of foundation (FRE 602).
122:5	122:18	Relevance.
123:19	124:11	Relevance.
124:23	125:2	
127:4	127:4	
127:10	127:11	
128:24	129:4	Calls for speculation; Lack of foundation (FRE 602).

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
130:22	131:23	
132:2	132:3	
132:12	134:15	Vague and ambiguous; lines 14 and 15 are not part of the designated question; Lack of foundation (FRE 602) (134:14-15).
134:24	135:2	Vague and ambiguous; Lack of foundation (FRE 602).
135:5	135:12	
135:24	136:22	Vague and ambiguous; Lack of foundation (FRE 602) (136:15-22).
136:24	137:2	Vague and ambiguous; Lack of foundation (FRE 602).
137:17	138:15	Mischaracterizes testimony (138:10-15).
138:17	138:18	Mischaracterizes testimony.
138:23	139:11	Mischaracterizes testimony; Compound (FRE 611(a));Lack of foundation (FRE 602) (139:4-11).
139:16	140:15	Mischaracterizes testimony; Compound (FRE 611(a));Lack of foundation (FRE 602) (139:16); Lack of foundation (FRE 602) (140:9-23).
140:18	140:25	Lack of foundation (FRE 602).
142:1	143:4	Lack of foundation (FRE 602) (142:22-143:4).
143:7	143:16	Lack of foundation (FRE 602).
143:20	144:1	Lack of foundation (FRE 602).
144:5	145:5	Mischaracterizes testimony; Calls for speculation; Lack of foundation (FRE 602) (145:5-7).
145:7	145:18	Calls for speculation; Lack of foundation (FRE 602) (145:13-18)
145:21	146:2	Calls for speculation; Lack of foundation (FRE 602)
146:6	146:15	Calls for speculation; Lack of foundation (FRE 602) (146:6-7)
150:15	150:19	Vague and ambiguous; Lack of foundation (FRE 602).

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Plaintiffs and Participating Unitholders' Affirmative Designations		GUC Trust and New GM Objections
Designation Begin	Designation End	
150:22	150:22	Vague and ambiguous; Lack of foundation (FRE 602).
152:1	152:11	
152:15	154:11	Cumulative (154:9-11).
154:15	155:24	Cumulative (154:15–155:1).

**GUC Trust and New GM's Counter Designations of the Deposition Testimony of Beth Andrews and the Plaintiffs and Participating Unitholders' Objections Thereto**

Beth Andrews November 15, 2017		
GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
9:14	10:12	
18:3	18:5	This is not a valid counter-designation, as neither completeness or fairness requires that it be considered contemporaneously with affirmatively designated content (FRE 106); relevance (401-403).
18:8	18:12	This is not a valid counter-designation, as neither completeness or fairness requires that it be considered contemporaneously with the designated content (FRE 106); relevance (401-403).
23:2	23:15	This is not a valid counter-designation, as neither completeness or fairness requires that it be considered contemporaneously with the designated content (FRE 106); relevance (401-403 – this is irrelevant to the issue of whether or not there was a binding agreement between the parties).
25:11	25:25	
28:13	28:25	This is not a valid counter-designation, as it does not

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		"complete" anything affirmatively designated and fairness does not require that it be considered contemporaneously with the designated content (FRE 106); relevance (401-403); foundation (601, 602).
34:21	35:4	This is not a valid counter-designation, and it is not clear which affirmatively designated content this excerpt could possibly purport to "complete" (FRE 106); relevance (FRE 401-403).
41:15	41:17	This is not a valid counter-designation, and further is contextually incomplete in and of itself (omits the relevant date discussion) (FRE 106); mischaracterizes testimony; relevance (401-403).
42:3	42:7	This is not a valid counter-designation, as it does not "complete" anything affirmatively designated and is in fact incomplete/out-of-context in and of itself (omits the relevant date discussion) (FRE 106); mischaracterizes testimony; hearsay (801, 802).
53:17	53:22	Not a valid counter-designation (does not "complete" anything affirmatively designated) (106); hearsay (801, 802); hearsay within hearsay (805); lacks foundation/ personal knowledge (601, 602).
54:24	55:4	Relevance (401-403); hearsay (801, 802); not a valid counter-designation because it does not "complete"

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		anything affirmatively designated and fairness does not require that it be considered contemporaneously with the designated content (106).
57:3	57:5	This is not a valid counter-designation as it does not "complete" anything affirmatively designated and fairness does not require that it be considered contemporaneously with the designated content (106); Relevance (401-403).
68:6	68:13	This is not a valid counter-designation as it does not "complete" anything affirmatively designated and fairness does not require that it be considered contemporaneously with the designated content (106); Improper opinion evidence (702); Foundation (601, 602).
68:15	68:19	This is not a valid counter-designation as it does not "complete" anything affirmatively designated, and fairness does not require that it be considered contemporaneously with the designated content (106); Improper opinion evidence (702); Foundation (601, 602).
69:23	70:1	Not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106) ; 403 (more confusing than probative); vague and ambiguous; foundation (601, 602).



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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
70:6	70:17	Not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106); 403 (more confusing than probative); vague and ambiguous.
72:8	72:12	Incomplete on its face and further not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106); hearsay (801, 802); vague and ambiguous.
74:1	74:2	Incomplete on its face and further not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106); improper designation of record objections (401-403 – irrelevant).
74:21	74:24	Incomplete and not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106); improper designation of record objections (401-403 – irrelevant).
75:9	75:12	Incomplete and not a valid counter-designation, as fairness or completeness requirements do not necessitate its inclusion with the designated content (106); improper designation of record objections (401-403 – irrelevant).
77:21	78:4	Not a valid counter-designation (does not “complete” anything

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		affirmatively designated) (106); hearsay (801, 802); lacks foundation/ personal knowledge (601, 602); calls for speculation/improper opinion (701, 702).
80:4	80:14	This is not a valid counter- designation, as neither completeness or fairness requires that it be considered contemporaneously with the designated content (FRE 106); relevance (401-403); lacks foundation (601, 602).
82:11	82:20	Hearsay; not a valid counter- designation for completeness or fairness purposes (FRE 106); relevance (401-403); lacks foundation (601, 602); calls for speculation.
84:7	84:23	Not a valid counter-designation for completeness or fairness purposes (FRE 106); relevance (401-403); lacks foundation (601, 602); hearsay (801, 802).
88:22	89:9	Not a valid counter-designation for completeness or fairness purposes (FRE 106); relevance (401-403); lacks foundation (601, 602); hearsay (801, 802).
99:3	99:6	
100:7	100:9	Lacks foundation (601, 602); not a valid counter-designation for completeness or fairness purposes (FRE 106); relevance (401-403); calls for speculation.
100:13	100:16	Lacks foundation (601, 602); not a valid counter-designation for

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		completeness or fairness purposes (FRE 106); relevance (401-403).
100:20	100:22	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – irrelevant).
101:5	101:6	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
104:12	104:13	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
104:23	104:24	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
110:23	110:24	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
112:1	112:7	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks foundation (601, 602); relevance (401-403).
112:12	113:3	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks foundation (601, 602); relevance (401-403); hearsay (801, 802).

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
113:7	113:20	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks foundation (601, 602); relevance (401-403); hearsay (801, 802); hearsay within hearsay (804).
113:23	114:3	Not a valid counter-designation for completeness or fairness purposes (106); calls for speculation; lacks foundation or personal knowledge (601, 602).
120:17	120:19	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
121:2	121:7	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objections (401-403 – relevance).
125:7	125:15	Incomplete (starts with an answer, preceding question not designated) (106); Not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); hearsay within hearsay (804); lacks foundation / personal knowledge (601, 602).
126:20	127:2	Not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); lacks foundation / personal knowledge (601, 602).
127:5	127:9	Not a valid counter-designation for completeness or fairness purposes (106); lacks foundation / personal knowledge (601, 602).

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
127:14	128:10	Incomplete (starts with an answer, preceding question not designated) (106); not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); lacks foundation / personal knowledge (601, 602).
132:4	132:7	Not a valid counter-designation for completeness or fairness purposes (106).
135:3	135:4	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
136:23	136:23	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
138:16	138:16	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
140:16	140:17	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
150:20	150:21	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403), and the selective designation of certain record objections in the middle of

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GUC Trust and New GM's Counter Designations		Plaintiffs and Participating Unitholders' Objections to Counter Designations
Counter-Designation Begin	Counter-Designation End	
		designated testimony and not others is incomplete in and of itself.
154:12	154:14	Not a valid counter-designation for completeness or fairness purposes (106); improper designation of record objection, which is irrelevant (401-403).
156:11	157:1	This is not a valid counter- designation to any of the designated content, and fairness/completeness requirements do not necessitate it being considered contemporaneously therewith (106).
158:1	158:4	Not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); 401-403.
158:7	158:22	Not a valid counter-designation for completeness or fairness purposes (106); hearsay (801, 802); 401-403.
158:25	159:8	Lacks foundation (601, 602); not a valid counter-designation (106).
163:12	163:15	Lacks foundation (601, 602); not a valid counter-designation (106); hearsay (801, 802); calls for speculation.
163:21	164:2	Not a valid counter-designation for completeness or fairness purposes (106); lacks personal knowledge/ foundation (601, 602); hearsay (801, 802); calls for speculation.
164:9	164:17	Not a valid counter-designation for completeness or fairness purposes (106); lacks personal knowledge/ foundation (601, 602); calls for speculation.